



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

January 18, 2024

MEMO ENDORSED

BY ECF

Hon. Jessica G.L. Clarke
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *United States v. Angel Gomez*, 23 Cr. 311 (JGLC)

Dear Judge Clarke:

The Government writes to (1) advise the Court of the parties' current trial availability, and, with the defendant's consent, (2) request a two-week extension of the current pretrial deadlines.

On January 11, 2024, the defendant requested a two-week adjournment of the trial currently scheduled for March 4, 2024, and a corresponding adjournment of the deadlines for pre-trial submissions. On January 12, 2024, the Court scheduled oral argument on the parties' pre-trial motions for February 5, 2024, and directed the parties to be prepared to discuss potential dates to reschedule trial at that proceeding.

With respect to the pending trial adjournment request, the parties are currently available for trial at the Court's convenience from March 18 through the end of April, and from May 16 through the end of June. The parties will be prepared to discuss new trial dates in further detail at the February 5 proceeding, and will update the Court if their availability changes.

In addition, the parties jointly request that the Court adjourn the current pre-trial deadlines by two weeks. Under that proposed schedule, the Government's expert disclosures would be due February 2, 2024; the defendant's expert disclosures would be due February 16, 2024; the parties' motions *in limine*, proposed voir dire, proposed verdict form, and proposed jury instructions would be due February 20, 2024; and any responses would be due February 27, 2024. In light of the parties' pending adjournment requests, the parties will also be prepared at the February 5 proceeding to discuss a new date for the final pre-trial conference, currently scheduled for February 20, 2024.

This is the parties' second request for an extension of expert disclosure deadlines; the Court granted the parties' first request, and the Government's expert disclosures are currently due on Friday, January 19, 2024. Apart from the defendant's pending January 11 extension request noted above, no prior requests for the remaining pretrial submission deadlines have been made.

Very truly yours,

DAMIAN WILLIAMS
United States Attorney

by:

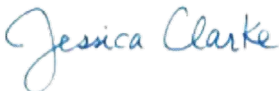


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cc: John Burke, Esq. (by ECF)

Application GRANTED. The Government's expert disclosures are hereby due on **February 2, 2024** and Defendant's expert disclosures are due on **February 16, 2024**. The Court will determine new deadlines for pre-trial submissions as well as a new date for the final pre-trial conference at the proceeding on February 5, 2024. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 31.

SO ORDERED.



JESSICA G. L. CLARKE
United States District Judge
January 18, 2024
New York, New York